

ADDITIONAL NAVY RESPONSES TO EPA COMMENTS ON CHANGED PAGES FOR SITE 7 FS AND RTCs

The following additional Navy responses pertain to EPA's comments (dated 29 May 1998) on the Site 07 (Calf Pasture Point) Pre-Final Feasibility Study, dated April 1998. The Pre-Final FS consisted of changed pages resulting from the incorporation of EPA and RIDEM comments on the Draft Final FS dated April 1997 and related Site 07 documents.

EPA COMMENT 30. Chapter 5, Page 2, Sec. 5.2, 2nd paragraph, 6th sentence - Remove sentence - the land use restrictions within Alternatives 3-5 will satisfy ARARs, therefore there is no need for any waivers.

RESPONSE: The sentence will be removed.

EPA COMMENT 33. Table 2-1, Page 1 and 2 - since the Navy is not proposing any cleanups standards so since these ARARs pertain to monitoring they are Action specific not chemical-specific ARARs.

RESPONSE (also applies to comments #30, 32): As noted by EPA in the above comment and in subsequent phone conversations, there will be no chemical-specific ARARs for the Site 07 remedial alternatives. Table 2-1 will be dropped and the ARARs therein will be used as action-specific ARARs in that they can be used for the development of performance standards for evaluating the effectiveness of the remedial alternatives. The text also will be changed accordingly. For example, statements regarding a particular treatment alternative's (i.e., Alternatives 3-5) ability to satisfy chemical-specific ARARs (Chapters 4 and 5) will be modified to state that the action-specific performance standards will be used to evaluate the effectiveness of those alternatives for addressing COC levels.

In conjunction with this modification, the Remedial Action Objectives (RAO) and General Response Actions (GRA) for Site 07 will be changed to reflect that the remedial alternatives focus on risk-management of the site rather than achieving chemical-specific ARARs. The RAO and GRA (Table 2-9) will be changed to read as follows:

Media	RAO	GRA
Shallow, Deep, and Bedrock Ground Water	<ul style="list-style-type: none"> • Prevent human exposure to COC in deep and bedrock ground water. • Ensure that the discharge of ground water to wetlands and offshore areas continues to pose no unacceptable risks from COC. 	<ul style="list-style-type: none"> • Monitor site risks from COC. • Restrict potential use of site ground water. • Conduct active or passive remediation of shallow and deep ground water, as appropriate to reduce risks from COC concentrations.

The Preliminary Remediation Goals (PRG) (Section 2.4) also will be modified to indicate that, as a risk-management site, the federal and state criteria will be used for evaluating the effectiveness of the remedial alternatives rather than for establishing cleanup goals.

It is the Navy's understanding that making those ARARs "action-specific" rather than "chemical-specific" does not cause substantive changes to the Site 07 remedial alternatives.